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THOMAS H. POPE  
(1913-1999)

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(1927-1994)

RECEIVED JUL 24 2012

June 12, 2012

Sharon Jaffess  
Chief Enforcement & Compliance Assurance Branch  
U.S. Environmental Protection Agency  
ATTN: SE-5J  
Region 5, 77 West Jackson Blvd.  
Chicago, Illinois 60604-3590

RE: Request for Information Pursuant to Section 104 of CERCLA for the Texas  
Township Drum Site in, Kalamazoo, Kalamazoo County, Michigan;  
CERCLIS ID: MIN000510313

Dear Chief Jaffess:

Please be advised that I and this firm represent Newberry County School District ("District"). This letter is in response to your recent request for information received by the District on May 16, 2012. Enclosed please find responses to such requests contained in your aforementioned letter.

As you will find from the enclosed responses, the District does not believe that it stored or disposed of any hazardous materials at the Texas Township Drum Site in Kalamazoo, Michigan, nor has it ever contracted with Donald Haugen, Environmental Network, Inc. or Chemical Assistance, Inc. With respect to waste management, the District has only done business with one entity: Crandall, Inc., of Lexington, SC. Therefore, the District cannot explain why it would have been listed in any promotional materials of the entities you referenced or.

If the District can be of any further assistance to you, please direct any such request to my attention.

With my kindest regards, I am,

Sincerely,

POPE &amp; HUDGENS, P.A.

  
Kyle B. Parker

KBP/rb

Enclosures

cc: Bennie Bennett, Superintendent  
Jim Suber, Assistant Superintendent for Operations

## **Enclosure B Requests**

i) Identify all persons consulted in the preparation of the answers to these Information Requests.

**RESPONSE:** Bennie Bennett, Newberry School District; Superintendant of Schools, Jim Suber, Assistant Superintendant for Operations, Newberry School District; Kenneth Rawls, Facility Manager, Newberry School District; Susan Dowd, Chief Financial Officer, Newberry School District; Vickie Bowers, Accounts Payable Specialist, Newberry School District; Neil Crapps, Crandall Corporation (Lexington, SC).

ii) Identify all documents consulted, examined or referred o in the preparation of the answers to these Requests, and provide copies of all such documents.

**RESPONSE:** Any and all purchase orders, invoices and waste manifest documentation of the District and those of Crandall Corporation (Lexington, SC).

iii) If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

**RESPONSE:** Neil Crapps, Crandall Corporation, Richland-Lexington Drive, Lexington, SC 29072; 800-248-4801.

iv) Did you ever enter into an oral or written contract or otherwise do business with either Chemical Assistance, Inc., Environmental Network, Inc., or Donald Haugen for the purpose of arranging the storage, treatment or disposal of waste materials? If you did, please identify the following:

**RESPONSE:** No

- a) The persons with whom you or such other persons made such arrangements;  
N/A
- b) The contact information for each person with whom such arrangements were made;  
N/A
- c) Every date on which such arrangements took place;  
N/A
- d) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid)

and the process for which the substance was used or the process which generated the substance;

N/A

- e) The owner of the waste materials or hazardous substances so accepted or transported;  
N/A
- f) The quality of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;  
N/A
- g) All tests, analyses and analytical results concerning the waste materials;  
N/A
- h) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;  
N/A
- i) The amount paid in connection with each transaction, the method of payment and the identity of the person from whom payment was received;  
N/A
- j) Where the person identified in (g) above intended to have such hazardous substances or waste materials transported and all evidence of this intent;  
N/A
- k) Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;  
N/A
- l) The final disposition of each of the waste materials or hazardous substances involved in such transactions;  
N/A
- m) The measures taken by you to determine the actual methods, means and site of treatment or disposal of the waste material and hazardous substances involved in each transaction;  
N/A
- n) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;  
N/A

- o) The price paid for (i) transport or (ii) disposal of (iii) or both, or each waste material and hazardous substance;  
N/A
- p) All documents containing information responsive to a) through p) above, or in lieu of identification of all relevant documents, provide copies of all such documents;  
N/A
- q) All persons with knowledge, information or documents responsive to questions a) through p), above;  
N/A